

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

STEVEN G. MILLETT, MELODY J.)
MILLETT, On Behalf of)
Themselves and All Others)
Similarly Situated,)
)
Plaintiffs,) 05-559-SLR
)
vs.)
)
TRUELINK, INC., A Trans Union)
Company,)
)
Defendant.)

THE VIDEOTAPED DEPOSITION OF

JOHN DANAHER

Taken on behalf of the Plaintiff

March 27, 2007

Reported by Cheryl L. Sandeck, CSR, RPR
Illinois License No. 084-03710

1 which one -- let me begin again, please.

2 Can you generally describe the manner in
3 which the credit monitoring product alerts a
4 consumer to the key changes?

5 A. Do you mean to describe the process?

6 Q. Please.

7 MR. O'NEIL: The process for alerting the
8 consumer of the key change?

9 MS. YEAGER: Correct.

10 THE WITNESS: We are notified from one of
11 the credit bureaus that a change has taken
12 place, and we send the customer an E-mail
13 advising them that there has been a change and
14 to come back onto our website to get the
15 details.

16 BY MS. YEAGER:

17 Q. The customer who comes to the website to
18 review the details, could you generally describe
19 what information they might see once they take that
20 step to come onto the website to review the changes
21 or the details that you were describing?

22 A. So, for example, if we send -- if there
23 has been a new inquiry, if you log onto the site,
24 you will see generally the date of the inquiry and
25 who made the inquiry. You might get the location.

1 which of these would trigger an alert to one of
2 your customers?

3 A. Just the one that I defined where somebody
4 is using your personal information to attempt to
5 get credit in your name.

6 Q. If an individual were using your
7 Social Security number and that was the only piece
8 of personal identification that was being reported
9 fraudulently, would the original holder of the
10 Social Security number be notified?

11 A. No.

12 Q. Why not?

13 A. Because there is no way to verify who is
14 the legitimate holder of that Social Security
15 number.

16 Q. If you had two -- do you need to take a
17 break?

18 A. No.

19 Q. If you had two customers who wanted to
20 subscribe to Credit Monitoring in 2003 and both of
21 those customers tried to sign up for Credit
22 Monitoring with your company in 2003 using the same
23 Social Security number, could they both do so?

24 A. Our system only allows for one account, a
25 unique Social Security number. So on our system,